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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
DIVISION

Booking # 2023000265

JADA DAVIS-BEY-39771

(Write the full name of the plaintiff in this action.)

Include prisoner registration number.) 50473

v.

COLE BREWER, LEBERT,
William Brush DHS Female officer
CHASLY HICKMAN
Jeffrey Reed
KRISTIAN STORM
BRYAN TYUS

(Write the full name of each defendant. The caption
must include the names of **all** of the parties.)

Fed. R. Civ. P. 10(a). Merely listing one party and
writing "et al." is insufficient. Attach additional
sheets if necessary.)

Case No: 4:23-cv-00507-HEA

(to be assigned by Clerk of District Court)

Plaintiff Requests Trial by Jury

Yes No

PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff should not send exhibits, affidavits, witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the \$400.00 filing fee or an application to proceed without prepayment of fees and costs.

I. The Parties to this Complaint

A. The Plaintiff

Name: JADA DAVIS BEY

Other names you have used: _____

PRISONER ID# number 34771

Prisoner Registration Number: _____

Current Institution: ST. LOUIS CITY JUSTICE CENTER

Indicate your prisoner status:



Pretrial detainee



Convicted and sentenced state prisoner



Civilly committed detainee



Convicted and sentenced federal prisoner



Immigration detainee



Other (explain): Detained - NO Bond

B. The Defendant(s)

To the best of your knowledge, give the information below for each defendant named in the caption of this complaint. Make sure the defendant(s) named below are the same as those listed in the caption of this complaint. Attach additional pages if necessary.

For an individual defendant, include the person's job title, and check whether you are suing the individual in his or her individual capacity, official capacity, or both.

Defendant 1

Name: COLE BREWER

Job or Title: P. POLICE OFFICER

Badge/Shield Number: 12332/304

Employer: ST. LOUIS METROPOLITAN POLICE Department

Address: 919 Jefferson, North Jefferson, St. Louis, MO 63106



Individual Capacity



Official Capacity

Defendant 2

Name: William Brush - DSN 4876

Job or Title: Sgt. Police officer

Badge/Shield Number: 4876/304

Employer: Metropolitan Police Department - City of St. Louis

Address: 919 N. Jefferson, St. Louis, Mo.



Individual Capacity



Official Capacity

II. Statement of Claim

Type, or neatly print, a short and plain statement of the **FACTS** that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

Attachment - Statement of Claim

Defendant 4 - 1. on January 13, 2023, Police officer Jeffrey Reed shot into my Toyota Sienna minivan. 2. at about 8:30 AM, 3. at 717 N. 16th Street, St. Louis, MO, 6310X. 4. I suffered a cut up left forearm from glass of my window in the rear driver side sliding door. 5. Seven shot out windows & Property inside shot full of holes and damaged & clean up confrontation with white people.

Defendant 5 - ON January 13, 2023 P.D. Kristen Sturm shot into my Toyota Sienna minivan. I suffered a cut Left Forearm, Seven windows shot out, minivan body shot full of holes, and Property damaged on the inside of my van. 2. on Jan. 13, 2023 at about 8:30 AM she did Shoot up my minivan. 3. this happened at 717 N. 16th Street, St. Louis, MO, 6310X. The night was 16, - is attacked by white people.

Defendant 6 - 1. P.D. Bryan Tyus shot up my Toyota Sienna Minivan, 2. this happened on Jan. 13, 2023, at about 8:30 AM. 3. at 717 N. 16th St. St. Louis, MO 6310X. 4. I suffered a cut Left Forearm, Seven windows shot out, bullets holes in my mobile home, Property inside my van damaged. 5. this is what Bryan Tyus did to harm me personally. I live alone in my attack by white people every night.

Defendant 7 - ON January 13, 2023, Federal Homeland Security Officer LEBERT WOKED me UP by BENTHEDON the REAR OF MY TOYOTA SIENNA minivan about 7:47 AM. 2. this happened on Jan. 13, 2023. 3. this happened at 717 N. 16th Street, St. Louis, MO, 6310X. 4. Officer LEBERT shot out the windows of my minivan and shot up the body of my minivan in a attempt to kill me. I suffered a cut Left forearm and property inside my minivan were damaged, I have nightmare about white people attack me in my sleep every night.

Defendant 8 - DHS female 1. on Jan. 13, 2023, I was shot up with a gun. 2. on January 13, 2023, she shot up my Toyota Sienna minivan. 3. on Jan. 13, 2023 about 2:30 PM. 2. this happened at 717 N. 16th St. St. Louis, MO, 6310X. 4. I suffered a cut Left Forearm, seven windows shot out, the body of my Toyota Sienna minivan being shot up, the property inside shot up and damaged by this female officer.

Question to this court. I Jada DAVIS best did surrender the European Corporation's Social Security Card to JAR - 4:20-cv-00213-JAR on 11-16-2020. IF I NEED TO TAKE POSSESSION OF IT - I SURE the Defendant(s) in the case - NO. 4:23-cv-00507-HEA Please request/ask Judge JAR to turn it over to you forthwith. I only put \$722-CR 000032 on the envelop because I might only mail this case mailings out!

ATTACHMENT - THE NAMES TO THE PLAINTIFFS

Defendant 3

Name CHASITY HICKMAN

Job/Title: Police Officer

Badge Number: 12236

Employer: St. Louis Metropolitan Police Department

Address: 919 N. Jefferson, St. Louis, MO, 63106

Individual capacity Official capacity Both

Defendant 4

Name: Jeffrey Reed

Job: Police Officer

Badge Number: 122714

Employer: St. Louis Metropolitan Police Department

Address: 919 N. Jefferson, St. Louis, MO, 63106

Individual capacity Official capacity Both

Defendant 5

Name: Kristian Storm

Job: Police Officer

Badge Number: 12197

Employer: St. Louis Metropolitan Police Department

Address: 919 N. Jefferson, St. Louis, MO, 63106

Individual capacity Official capacity Both

Defendant 6

Name: Bryan TYUS

Job: Police Officer

Badge Number: 12248

Employer: St. Louis Metropolitan Police Department

Address: 919 N. Jefferson, St. Louis, MO, 63106

Defendant 7

Name: LEBERT

Job: Federal Homeland Security Officer

Badge Number: UNKNOWN

Employer: U.S. Department of Homeland Security

Address: 1550 Spruce Street - Room 2,003, St. Louis, MO 63103

Defendant 8

Name: DHS Female Officer - who showed up with Officer LEBERT

Job: Federal Homeland Security Officer

Badge Number: UNKNOWN

Employer: U.S. Department of Homeland Security

Address: 1550 Spruce Street - Room 2,003, St. Louis, MO 63103

1. on Jan. 13, 2023 around 1:47 am to 1:47 am Police Officer COLE BREWER made up a conversation with "JADA DAVIS" that never happened / took place between him and I. COLE BREWER "swatted" me by calling in a false Police Report on January 13, 2023 at ~~4~~ and called the Department of Homeland Security and they showed up to where I parked my TOYOTA Sienna minivan at 717 North 16th Street, HERE COLE BREWER stated in his Affidavit in Support of Application for Evaluation and Treatment / Rehabilitation - Admission for 96 Hours.

2. In Cole Brewer knowingly and intentionally made up a conversation that never took place with me and said that I Threatened to "Shoot up" the Social Security Admin. Action Building in a false Affidavit on Jan. 13, 2023, and also on Jan. 17, 2023, in his Order for 96 Hour Detention, Evaluation and Treatment and Warrant, COLE BREWER when went before a Court - PROBATE Division Case Number 2322-MH-0082 knowingly and intentionally filed a false application without Probable Cause, at the IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST. LOUIS, MISSOURI, in the PROBATE DIVISION. At the CARNAHAN COURT HOUSE, 1114 Market Street, St. Louis, MO. 63101

3. Police Officer COLE BREWER FILED a false Police Report, a false affidavit, and application without Probable Cause in downtown St. Louis, Missouri, 63101.

4. The injuries that I suffered was a cut Left forearm from the broken glass of my TOYOTA Sienna minivan, Drivers side rear sliding door's window, when I waved a white TOWEL TO SIGNAL to the St. Louis Metroitan Police Department to stop shooting in to my mobile.

III. Injuries SEE ATTACHED SHEET

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

IV. Relief

State briefly and precisely what you want the Court to do for you. Do not make legal arguments. Do not cite any cases or statutes. If you are requesting money damages, include the amounts of any actual damages and/or punitive damages you are claiming. Explain why you believe you are entitled to recover those damages.

*1.000 REQUESTING ONE BILLION U.S. Dollars - 1.000
IN GOLD and SILVER in Damages, 800 Dollars Per day For
FALSE IMPRISONMENT/PUNISHMENT Damages and ONE million U.S. Dollars
Per day for being forced to sleep on the Streets on 1-14/15/16/17, 2013,
and ONE million U.S. Dollars Per day for forced 96 Hour Psychiatric
Hospital Stay/Evaluation, and ONE million U.S. Dollars for my
SOUL TAX - The 3rd Amendment - 1000 U.S. Dollars Being
deducted from the 1.000 - I am entitled to the 1.000 U.S. Dollars*

V. Exhaustion of Administrative Remedies/Administrative Procedures

The Prison Litigation Reform Act (“PLRA”) 42 U.S.C. § 1997e(a), requires that “[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted.”

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes No

If yes, name the jail, prison or other correctional facility where you were confined at the time of the events giving rise to your claim(s):

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes No Do not know

C. If yes, does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claims?

Yes No Do not know

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (*Describe all efforts to appeal to the highest level of the grievance process.*)

- F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

- G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VI. Previous Lawsuits

The “three strikes rule” bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has “on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.” 28 U.S.C. § 1915(g).

A. To the best of your knowledge, have you ever had a case dismissed on the basis of this “three strikes rule”?

Yes No

If yes, state which court dismissed your case and when it was dismissed. Attach a copy of the court’s order, if possible.

Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the state and county)

3. Docket or case number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending?

Yes

No (If no, give the approximate date of disposition): _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

Yes No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the state and county)

3. Docket or case number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending?

Yes

No (If no, give the approximate date of disposition): _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

VII. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 1 day of May, 2023.

Signature of Plaintiff

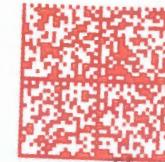
Jada Davis b/e
39771-3D-16
St. Louis City Justice Center
200 S. Tucker Boulevard

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St Louis, MO 63103-0000
Mailing location from Helco

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Eastern District of Missouri
111 S. Tenth Street
St. Louis, Missouri 63102

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